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Commissioner Phil Giudice
Commonwealth of Massachusetts
Department of Energy & Environmental Affairs
100 Cambridge Street, Suite 1020
BOSTON, MA 02114

Dear Phil,

COMMONWEALTH OF MASSACHUSETTS: BIOMASS SUSTAINABILITY & CARBON POLICY STUDY

We noted with interest the release of the DOER/Manomet study of woody biomass energy, the media headline reactions that “wood is worse than coal” for GHG emissions, and the press release from your office stating: “...we know that electricity from biomass harvested from New England forests is not ‘carbon neutral’ in a timeframe that makes sense...”.

We acknowledge the importance of ensuring sustainable production of biomass and of accounting emissions. If this is done we believe that biomass can make an important contribution to tackling climate change.

The UK’s Biomass strategy acknowledges the importance of fuels sourced from biomass. We believe that biomass will have an important role to play in meeting the EU target of 20% renewable energy by 2020. Sustainable biomass has low carbon characteristics and can be a low carbon fuel – the carbon emissions from the use of biomass as a fuel can be offset by the carbon captured during its growth. Clearly the balance is sensitive to the carbon intensity used in the production, supply and transport of biomass. Where biomass is produced and processed with due regard to sustainability and carbon savings, we believe it can deliver a reduction in overall carbon emissions and will help tackle climate change. The biggest savings of carbon dioxide occur when wood replaces carbon-intensive, fossil fuels, especially in areas that are off the gas grid.

You may be interested in a study “Minimising greenhouse gas emissions from biomass energy generation” was carried out by the UK’s Environment Agency, this is available at:

http://www.environment-agency.gov.uk/static/documents/Research/Minimising_greenhouse_gas_emissions_from_biomass_energy_generation.pdf

A recent European Climate Foundation report (10 June 2010) says: *the most common types of biomass energy applications reduce carbon dioxide emissions significantly, by 55-98% compared to fossil fuels, even when transported long distances, as long as it does not result in any land-use changes.* It goes on to add: *Biomass can play an important role in European renewable energy production beyond 2020, for instance as one of few ways (another being CCS) to reduce carbon dioxide emissions from coal power plants with long remaining life-times. Biomass is not only a short-term bridging solution.*

The full report can be found at:

http://www.europeanclimate.org/index.php?option=com_content&task=view&id=77&Itemid=42

The UK’s Department of Energy and Climate Change have information on Strategies for bioenergy and materials – can be found on:

http://www.decc.gov.uk/en/content/cms/what_we_do/uk_supply/energy_mix/renewable/explained/bioenergy/policy_strat/policy_strat.aspx

We look forward to hearing more through this period of consultation. Please let us know if we can be of any assistance or if there are any areas of specific interest to you.

Best regards,

Chris

C G Henderson
Deputy Consul General